

Last modified: <<10 Nov, 2018>>

## **Privacy Policy**

### **INTRODUCTION**

Our website [www.auto-song.com](http://www.auto-song.com) (Defined as “We”, or auto-song in the Policy) values your privacy and takes your personal privacy seriously and is committed to duly comply with the relevant privacy and personal data protection laws and regulations in HKSAR. This Privacy Policy informs you of your choices and our practices regarding any Information you provide to us.

The use of our services may involve the collection and use of your Information (as defined in the “The Information We Collect and How We Collect It” sections below) on our services (including our websites and mobile applications, if any). It is important for you to understand how this happens and how you may control it, so please read this Privacy Policy carefully.

By using our services, you consent to and agree that we may collect, use and share your Information in accordance with this Privacy Policy, as revised from time to time.

If you wish to contact us regarding this Privacy Policy or any privacy-related matters, please contact our Privacy Officer via email [legal@auto-song.com](mailto:legal@auto-song.com).

### **I. Use of Personal Data and Other Information**

If you are a user of the Services (“Customer”), personal data is collected from you to enable the Company to provide Services to you. We shall indicate to you the personal data or information without which we shall be unable to provide you the Services. You may decline to provide the Company with the requested personal data, but in such case the Company may not be able to provide the Services to you. If you are a visitor to our Platforms, other than a Customer, you need not supply any personal data to access our Platforms, although we may ask you to provide certain personal data for downloading and installing the Platforms. However, if you require follow-up services by our responsible officers such as requesting the Company for catalogues, other promotional brochures or materials or providing you update on any of the Services, including potential new Services and extension of service coverage or plan(s) offered, then the provision of your name and at least one of the contact details are obligatory for us to provide the corresponding follow-up services to you through your contact details provided. We may also require certain personal data from you if you participate in our events or surveys, or subscribe to our newsletters, promotions and offers. Provision of your personal data under such circumstances is entirely voluntary but we shall be unable to process your inquiry, participation or subscription if you do not provide your name and/or contact details.

1. Personal data collected from you may be used by the Company for:
  - (1) Your Personal Data may be used for member identification, contacting you, sending payment reminders, award notices, payment receipt notice, invoices, and/or other update notices related to auto-song services to you, and providing auto-song services to you generally.
  - (2) Your Personal Data, Use and Technical Data and/or other information may be used for the purposes of internal audit, analysis and research for improving auto-song services, facilitating user communications and/or developing new services.
  - (3) Processing of payment instructions or collection of amounts outstanding from you in relation to the provision of the Services.
  - (4) Provision of customer services.
  - (5) Following up and handling your complaints and enquiries.
  - (6) Any other purposes as may be separately notified to or agreed with you, including the purposes stated in any special terms and conditions, other terms and conditions and application for the supply of specific goods and services; and
  - (7) Any other purposes directly related to the purpose for which the personal data were originally collected.
2. We may however share with third parties comprehensive non-personal data, i.e. modified data from your Personal Data which has been sub-grouped and will not be able to reflect or identify any specific individual.
3. We will not use your Personal Data for any purposes other than the purposes stipulated above unless the local laws provide otherwise; and will not disclose them to any third party without your prior consent, unless the laws require so due to material national interests or for the purpose of facilitating law enforcement agencies' investigations.

## **II. Types of Data Collected**

Types of personal data collected by the Company may include:-

1. When you register as a member of auto-song service, you will be required to provide certain information, including, but not limited to, an account ID (in the form of an email address), your name, contact number, place of residence, contact address, backup email address, Paypal Accountm etc.
2. When you use auto-song service, we may also collect other information, including:
  - (1) information about your use of auto-song service, including your history of use, and/or searches conducted by you; and/ or

- (2) technical data, including URL, IP address, web browser type, operation system, language, and time of your visit (which may be collected through the use of cookies) to enable certain functionalities of our website (Collectively, "Use and Technical Data").
3. To properly and promptly provide you with auto-song service, you will be required to provide your account ID, contact information or other information when using auto-song service, for example, when you apply to change your account details, provide your feedback or participate in our promotion activities.
4. Information relating to your social media profiles (e.g. where your social media accounts are linked with our Platforms and/or your login details are authenticated by third party social media platforms).

### **III. Retention of Personal Data**

Unless there is a mandatory legal requirement for us to keep your personal data for a specified period, we will only retain your personal data for as long as necessary to fulfill the purposes specified above for which the personal data were originally collected. We will periodically redact, purge, anonymize or destroy unnecessary personal data in our system in accordance with our internal procedures. As such, your Personal Data will be deleted from our records upon termination of your auto-song account.

### **IV. Security of Personal Data**

1. We will adopt all necessary technologies and measures to protect your Personal Data in order to safeguard your privacy. Access to your Personal Data is restricted to our employees and agents on a need-to-know basis.
2. To avoid information leakage, you should keep your Personal Data, such as your account ID and password, etc. in safe custody. To avoid misuse of your Personal Data, you should log out or close the app/ software or internet browser after using auto-song services, whether you are using your own personal computer/ device or not.
3. You should keep your payment particulars (including credit card details) in safe custody to avoid being used by others for illegal purpose.
4. auto-song services may include hyperlinks to third parties' websites or webpages. We are not responsible for any personal information that you provide to such third parties at or through those websites.
5. You agree to use true and accurate information for purchases via auto-song services. You should notify us immediately if you find your Personal Data has been misused by others or if you notice something abnormal.

6. You agree that the information you provide and use when using auto-song services is lawful and does not infringe any third party's rights, violate any agreement with third party, or otherwise involve any illegal acts. If your use of auto-song services causes any third party's loss, we will not be liable for such loss unless it is caused by us intentionally or due to our gross negligence.

#### **V. Access to Personal Data**

1. You may search, review, modify, update and/or make a copy of your Personal Data by logging into your auto-song account. If you are not our member or we have not yet verified your membership, you may request to search, review, modify, update and/or make a copy of your Personal Data by providing us with your relevant personal data and other written documentation (as may be necessary to enable us to process your request).
2. You may request to suspend the use of or delete your Personal Data. However, once the use of your Personal Data is suspended or your Personal Data is deleted, you will no longer be able to use auto-song services.
3. We are entitled to refuse your request to modify, update or delete your Personal Data if such request may be harmful to material national interests, result in impediment to the execution of statutory duties by government agencies, or cause any prejudice to the material interests of a third party.

In the event that there is any inconsistency between the English and Chinese versions of this Statement, the English version shall prevail.